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*Counsel for Defendant Eli Lilly and Company*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

NEKTAR THERAPEUTICS,  
  
Plaintiff/Counter-Defendant,  
  
v.  
  
ELI LILLY & CO.,  
  
Defendant/Counter-Claimant.

CASE NO. 3:23-CV-03943-JD

**DECLARATION OF RYAN J. MOORMAN  
IN SUPPORT OF LILLY'S MOTIONS *IN  
LIMINE***

Judge: Hon. James Donato

1 I, Ryan J. Moorman, hereby declare as follows:

2 1. I am a Partner at Kirkland & Ellis LLP, counsel of record for Defendant Eli Lilly and  
3 Company (“Lilly”) in the above-captioned action. I am a member in good standing of the Bar of the State  
4 of Illinois and have been admitted pro hac vice in this matter.

5 2. I provide this declaration in support of Lilly’s Motions *in Limine*, filed contemporaneously  
6 herewith.

7 3. The statements in this declaration are based on my personal knowledge. If called to testify  
8 as a witness, I could and would testify competently to them.

9 4. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the deposition  
10 transcript of Jennifer Ruddock, dated January 24, 2025, cited in support of Lilly’s Motion *in Limine* No. 1.

11 5. Attached hereto as Exhibit 2 is a true and correct copy of an August 23, 2022 email, as  
12 produced by Lilly in discovery bearing the beginning bates number LLY00983750, cited in support of  
13 Lilly’s Motion *in Limine* No. 2.

14 6. Attached hereto as Exhibit 3 is a true and correct copy of an October 16, 2022 email chain,  
15 as produced by Lilly in discovery bearing the beginning bates number LLY00788687, cited in support of  
16 Lilly’s Motion *in Limine* No. 2.

17 7. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the deposition  
18 transcript of Jonathan Zalevsky, dated January 17, 2025, cited in support of Lilly’s Motion *in Limine*  
19 No. 4.

20 8. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the deposition  
21 transcript of Howard Robin, dated January 22, 2025, cited in support of Lilly’s Motion *in Limine* No. 4.

22 I declare under penalty of perjury that the foregoing is true and correct, and that this declaration  
23 was executed on September 25, 2025 in Chicago, Illinois.

24  
25 s/ Ryan J. Moorman, P.C.

26 Ryan J. Moorman, P.C.  
27  
28

# Exhibit 1

## (Submitted Under Seal)

# Exhibit 2

## (Submitted Under Seal)

# Exhibit 3

## (Submitted Under Seal)

# Exhibit 4

## (Submitted Under Seal)

# Exhibit 5

## (Submitted Under Seal)